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May 10, 2019

Via Hand Delivery and Email

Hon. Andre M. Davis
City Solicitor
City Hall – Suite 101
100 N. Holliday Street
Baltimore, Maryland 21202

Re: Mayor and City Council of Baltimore, et al. v. The Stronach Group, et al.
Circuit Court for Baltimore City, Case No. 24-C-19-001776

Dear Judge Davis:

As a follow-up to our call to you of today, we are attaching a copy of the email dated yesterday, May 9, 2019, from Bruce Bereano to Comptroller Franchot, delivering to the Comptroller your letter of May 8, 2019. As Mr. Bereano states, he is acting “on behalf of the Solicitor of Baltimore City” and an unnamed “client who is working with Baltimore City...”.

As you must know, public sources identify Mr. Bereano as representing the interests of

[REDACTED]

[REDACTED] Further, your letter, from whatever source it was derived, presents incomplete, faulty and inaccurate information and conclusions that reasonable inquiry of our clients or other available information would have addressed. In fact, full and accurate information with respect to a number of items in your letter is set forth in the audited financial statements provided to the Maryland Racing Commission and recorded in accordance with longstanding practice.

As disturbing, in the midst of litigation initiated by the City, you failed to extend to us or our clients the courtesy of a copy of your communications with the Comptroller. The City’s actions, apparently in league with Mr. Bereano and his client, raise serious concerns, including interference with our clients’ legitimate business rights and interests. Please be informed that our clients will take all reasonable actions to protect those business rights and interests from such interference.

Last, actions such as these further impede the discussions that should be undertaken with the City, State and all other stakeholders to address the underlying issues. We again call upon the City to reconsider the wisdom of its unsupportable lawsuit and its unproductive attempts

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publicly to undermine our clients' interests. They do nothing to advance the consideration of responsible solutions.

Very truly yours,

Alan M. Rifkin

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*Counsel for The Maryland Jockey Club of Baltimore City,
Inc., The Maryland Jockey Club, Inc., Pimlico Racing
Association, Inc. and the Preakness Stakes®*

Attachment

cc: Suzanne Sangree, Senior Counsel, Baltimore City Dept. of Law